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February 21, 2025

VIA ECF

Hon. Dale E. Ho
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Trippett v. CJJ Fay Da Group LLC*
Civil Action No. 1:25-cv-00511-DEH-VF
RR File No. 015284-00001

Dear Honorable Dale Ho:

This office just recently finalized its retention to represent Defendant CJJ Fay Da Group LLC (“Defendant”) in the above-referenced matter. We write to request an extension of Defendant’s time to respond to the putative class action complaint. Defendant was served on or about January 25, 2025, and the docket states that its response to the Complaint was due to be filed on or before February 18, 2025. We request that the Court extend Defendant’s time to respond through April 4, 2025. This application is made in compliance with Federal Rule of Civil Procedure Rule 6(b)(1)(A) and Your Honor’s Individual Rules in 2(e).

The request for an extension is being made so that we may meaningfully consult with the Defendant concerning the complex allegations raised in the putative class action complaint concerning Defendant’s website and defenses thereto. The reason this request for an extension was not made in advance of the February 18, 2025, expiration of Defendant’s time to respond to the Complaint is that our retention had not yet been finalized. Notwithstanding, we have commenced discussions with Plaintiff’s counsel to explore whether an early resolution of this action is feasible prior to incurring the cost of preparation and service of Defendant’s response, and look forward to continuing those conversations.

This request is being made with the consent of Plaintiff’s counsel, Gabriel A. Levy, of Gabriel A. Levy, P.C., and there have been no prior requests for an extension of time to respond to the Complaint. Based on our review of the docket, there are no scheduled conferences or other court deadlines that would be affected by the present request.

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Accordingly, we respectfully request that this Court grant Defendant's application to extend Defendant's time to respond to the Complaint through April 4, 2025, by "So Ordering" this letter in the space provided below. We are, of course, available to discuss the matter at the Court's convenience.

We thank the Court for its attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Lawrence S. Han
Lawrence S. Han

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 2/24/25

The extension requested herein is GRANTED. The Clerk of Court is directed to terminate the gavel at ECF No. 10.